

# COHEN & GREEN

September 12, 2022

Hon. Lois Bloom, U.S.M.J.  
United States District Court for the Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

By Electronic Filing.

**Re: Case No. 1:19-cv-02170-EK-LB, Rudler v. MLA Law Offices, LTD et al.**

Dear Judge Bloom:

As the Court may recall, my firm represents the Plaintiff in the case above. I write, jointly with Defendants, to ask that the Court to adjourn the conference scheduled for September 13, 2022, at 11:00 a.m. for 45 days (or as soon thereafter as the Court is available). I apologize that this letter is coming later than the time the Court had set for applications to adjourn (*see* Aug. 25, 2022 Minute Order). I understand that Defendants' counsel contracted COVID-19 last week and was not able to do legal work, and therefore we jointly ask for the Court to excuse this out of time application. The parties have reached a tentative resolution of the issues, but whether that resolution is final turns on whether — 30 days from today — Defendants make a payment (and that payment clears).<sup>1</sup>

If the payment clears, the parties then intend to file a satisfaction of judgment on consent, bringing this case to a final close — and obviating the need for any conference on the motion at ECF No. 116. In connection therewith, Defendants withdraw the document at ECF No. 121 as it contains frivolous legal arguments.

As ever, we thank the Court for its time and consideration.

Respectfully submitted,

/s/

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J. Remy Green

*Honorific/Pronouns: Mx., they/their/them*

**COHEN&GREEN P.L.L.C.**

*Attorneys for Plaintiff*

1639 Centre St., Suite 216

<sup>1</sup> For posterity, the agreement is that Defendants will pay \$20,000.00 within 7 days of an Order approving this extension, and \$5,000.00 within 30 days of that Order, and in exchange, Plaintiff will waive the balance of fees due.



Ridgewood, New York 11385

cc:  
All parties by ECF.